



Andrew J. Spano
County Executive

Office of the County Attorney

Charlene M. Indelicato
County Attorney

BY FACSIMILE (914) 390-4179

August 1, 2008

Honorable Stephen C. Robinson
United States District Judge
Southern District of New York
United States Courthouse
300 Quarropas Street, Room 633
White Plains, New York 10601-4150

MEMO ENDORSED

Re: **George Carr v. County of Westchester**
07 Civ. 11180 (SCR)

Your Honor:

I am respectfully writing at the suggestion of Courtroom Deputy Brandon Skulnick to request an extension of time for County Defendant to respond to Plaintiff's discovery demands and to serve County Defendant's discovery demands. I have spoken with Chris Watkins, Esq. of the firm of Sussman and Watkins, attorneys for Plaintiff. Mr. Watkins has consented to an adjournment until **September 15, 2008**, subject to the Court's approval.

If this adjournment is granted, County Defendant will file its responses to Plaintiff's discovery demand as well as its discovery demands to Plaintiff on or before **September 15, 2008**. If this application is granted, it is respectfully requested that the Scheduling Order be adjusted to reflect this change in the following manner: depositions to be completed by **January 15, 2009**; further interrogatories, including expert interrogatories to be served by **February 2, 2009**; requests to admit to be served by **February 16, 2009** and discovery to be completed by **March 16, 2009**.

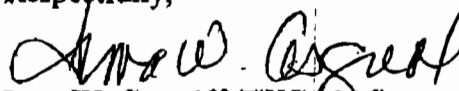
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Michaelian Office Building
148 Martine Avenue, 6th Floor
White Plains, New York 10601

Telephone: (914)995-2660 Website: westchestergov.com


Should Your Honor's staff have any questions, I can be reached at (914) 995-3577. Thank you.

Respectfully,


Irma W. Cosgriff (IWC 1326)
Senior Assistant County Attorney

IWC/st

cc: Michael H. Sussman, Esq. (By Facsimile (845) 294-1623)
Sussman & Watkins
PO Box 1005
Goshen, New York 10924
(845) 294-3991

APPLICATION GRANTED

HON. STEPHEN C. ROBINSON
8/1/08